IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

IN RE: **BLUE CROSS BLUE SHIELD** ANTITRUST LITIGATION (MDL NO. 2406)

Master File No. 2:13-CV-20000-RDP

This document relates to: **Subscriber Track**

FULLY INSURED SUBSCRIBER PLAINTIFFS' NOTICE OF FILING

Please take notice that in compliance with the Court's October 8, 2021 Order on reciprocal disclosure (Doc. 2841), the Fully Insured Subscriber Plaintiffs are filing copies of their engagement documents. Subject to and in accordance with the Court's Protective Order under Fed. R. Evid. 502(d) (Doc. 139), Fully Insured Subscriber Plaintiffs hereby preserve and do not waive any objections to the privileged or confidential nature, nor relevance or admissibility, of any of the information provided in this filing. Subscriber Plaintiffs further note that certain documents submitted with this filing have been redacted as required in accordance with (1) Fed. R. Civ. P. 5.2 regarding social security or taxpayer-identification numbers, home addresses and similarly protected information; (2) the Court's Protective Orders (Docs. 139, 550 and subsequent modifications thereof) regarding attorney-client privileged communications and Confidential Health Information; and (3) consistent with Special Master Judge Harwood's December 14, 2017 Seal Guidelines in this case regarding the producing party's privacy interests in confidential business information.

Dated: October 15, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on this the 15th day of October, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF filing system, which will send a copy to all counsel of record.

/s/ David J. Guin
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